

California Regional Water Quality Control Board

Central Coast Region



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March 17, 2006

Stacy Lawson City of Lompoc 100 Civic Center Plaza P.O. Box 8001 Lompoc, CA 93438-8001

COMMENTS – STORM WATER MANAGEMENT PROGRAM; CITY OF LOMPOC, SANTA BARBARA COUNTY, WDID # 3 42MS03001

Ms. Lawson:

Central Coast Regional Water Quality Control Board (Water Board) received comments and a request for public hearing for the City of Lompoc (City) Storm Water Management Plan (SWMP). The purpose of the SWMP is to comply with requirements in the National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004 for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit). Water Board staff has reviewed the February 9, 2006 comment letter submitted by the Coast Law Group LLP, on behalf of Heal the Ocean, and concur with some of their suggested modifications.

The City must make the following modifications to the City's SWMP:

- 1. <u>Numeric Targets</u> The SWMP must include numeric targets as measurable goals. For example, the City should include numeric targets for providing educational materials, such as reaching a certain percentage of the City's target audience each year.
- 2. <u>Bilingual Education</u> The City must include bilingual educational materials to ensure educational and outreach materials are useful for all citizens. Provide a schedule for developing bilingual educational materials.
- 3. <u>Hotline</u> The City must include the hotline number in outreach materials and should include the hotline number in the SWMP. The City must include a plan for call response when the hotline is not staffed (after hours, weekends, holidays). The City must also provide a mechanism for tracking calls, responses, and follow-up enforcement.
- 4. <u>Storm Drain Stenciling</u> The City must provide specifics regarding how citizens groups will be encouraged to participate in storm drain stenciling. The City must outline a mechanism to evaluate the number of storm drains requiring marking and set an annual target number to stencil.

California Environmental Protection Agency



- 5. Non-storm Water Discharges The City must identify non-storm water discharges that are significant sources of pollutants and provide a strategy for dealing with those discharges within the City. Water line flushing, residential car washing, and chlorinated swimming pool discharges are common urban pollutants sources and must be addressed in the SWMP.
- 6. <u>Storm Drain Surveys</u> The City must include an estimated percentage of the storm drain system that will be surveyed annually and include a description of the survey protocols. The City should establish a mechanism for tracking surveyed areas, including how problems are identified and corrected.
- 7. Street Sweeping The City must provide a proposed street sweeping schedule in the SWMP.

Please address these comments, and submit a copy of your amended SWMP no later than <u>April 17</u>, <u>2006</u>. Provide a table summarizing SWMP changes with referenced page numbers for all modifications. You are required to submit two versions of the revised SWMP. One revised SWMP showing additions and deletions in <u>underline</u> and <u>strikethrough</u> format, respectively, and one without underline and strikethrough formatting. All submitted materials must be provided in hard copy and electronic format (MS Word). This information is required pursuant to California Water Code Section 13383 to determine compliance with permit requirements. Evidence that supports requesting this information includes the SWMP received on October 19, 2005. Failure to address our questions/comments and submit a revised SWMP by the date prescribed above may result in formal enforcement action pursuant to California Water Code Section 13385.

Any person affected by this action of the Water Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with California Water Code Section 13320, and Title 23, California code of Regulations, Section 2050. The petition must be received by the State Board, Office of Chief Counsel, within 30 days of the date of this letter. Copies of the law and regulations applicable to filing petitions will be provided upon request.

We look forward to working with you to finalize your SWMP. If you have questions regarding this matter, call Ryan Lodge at (805) 549-3506.

Sincerely,

Roger W. Briggs Executive Officer

cc: Marco A. Gonzalez, Coast Law Group LLP

Hillary Hauser, Heal the Ocean Priya Verma, Heal the Ocean

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